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**Admitted in New Jersey*

November 25, 2024

BY ECF and Email

Hon. Lewis J. Liman
United States District Judge
Southern District of New York
500 Pearl Street, Rm. 701
New York, NY 10007

Re: United States v. Gerald Shvartsman,
23 CR 307 (LJL)

Dear Judge Liman:

I am retained counsel for the above-referenced defendant. I write to request that the Court extend my client's surrender date by approximately 90 days, from January 3, 2025 to April 15, 2025. The reasons for this request are stated below, and in the letters from the Defendant and Steven Bramson, which are attached together as Exhibit A. I have discussed this application with AUSA Matthew Shahabian, and he informs me that the United States Attorney's Office opposes it.

When the Court pronounced its sentence on October 16, it directed the Defendant to surrender to the Bureau of Prisons' custody on or before January 3, 2025. This directive is also reflected in the Court's Criminal Judgment. At the time it set the January 3 surrender date, the Court understood that the Defendant, who will likely face deportation after serving his sentence, has a great deal of work to do to unwind his domestic life in Florida and to plan for the continuation of his furniture business in Florida in his absence. The request for additional time before surrender is based on the need for additional time to complete these tasks, as described in the enclosed letters attached as Exhibit A.

If the Court is willing to grant this application, it may do so by endorsing this letter at the

“So Ordered” signature line below.

Respectfully submitted,

Roland G. Riopelle

Roland G. Riopelle

Enc.

Cc: All Counsel (By ECF and Email)

The Defendant Gerald Shvartsman having made an application to extend his time to surrender to the custody of the Federal Bureau of Prisons to April 15, 2025 at 2 pm, and the United States Attorney’s Office having opposed this application, and good cause appearing to grant the application given the extensive preparations the Defendant must make before beginning his sentence of incarceration, now therefore,

IT IS ORDERED THAT, the Defendant Gerald Shvartsman’s date to surrender to the custody of the Federal Bureau of Prisons is extended to April 15, 2025 at 2 pm.

IT IS SO ORDERED:

HON. LEWIS J. LIMAN
U. S. D. J.